

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil Action No.
	)	3:08-CV-438-B
RYAN M. REYNOLDS; JASON WYNN;	)	
CARLTON FLEMING; BEVERAGE CREATIONS,	)	
INC.; BELLATALIA, LP; WYNN INDUSTRIES,	)	
LLC; and THOMAS WADE INVESTMENTS, LLC,	)	
	)	
Defendants.		

**NOTICE REGARDING SEC’S REQUESTS AND PROPOSALS (ECF DOC. NO. 313)**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Defendants Carlton Fleming, Regus Investment Group, LLC, and Thomas Wade Investments LLC (the “Fleming Defendants”) files this Notice Regarding SEC’s Requests and Proposals (ECF Doc. No. 313) pursuant to this Court’s Order (ECF Doc. No. 314) and respectfully shows the Court as follows:

The Fleming Defendants oppose the relief sought by the SEC, including its request for the imposition of a permanent penny stock bar.

The Fleming Defendants also contend that they are appropriate candidates for a waiver of disgorgement, penalties, and prejudgment interest. To date, the Fleming Defendants have produced more than 700 pages of financial records. In consultation with the SEC the Fleming Defendants have recently requested even more information from their financial institutions relating to accounts that were closed in the wake of the SEC’s action and asset freeze. The

Fleming Defendants remain committed to the waiver process and will continue to provide information to the SEC in connection with their waiver process.

Given their continued commitment to the waiver process, the Fleming Defendants respectfully suggest that the deadline for the SEC to seek final judgment from the Fleming Defendants be no earlier than September 1, 2012. This should allow ample time for the waiver process to run its course.

DATED: June 8, 2012.

Respectfully submitted,

**SNR Denton US LLP**

By: /s/Gene R. Besen

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**CERTIFICATE OF SERVICE**

This is to certify that on June 8, 2012 I electronically filed the foregoing Notice with the clerk of the court for the U. S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consent in writing to accept this Notice as service of this document by electronic means.

/s/Gene R. Besen

Gene R. Besen

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